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2	Nevada Bar No.: 11122
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6	Attorney for Plaintiff Michael Johnson
7	UNITED STATES DISTRICT COURT
8	DISTRICT OF NEVADA
9	

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**PREJUDICE** 

MICHAEL JOHNSON, an individual,

Plaintiff,

VS.

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AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, LOCAL 1199, a local non-profit and national labor union; VERNON STEED, individually and in his capacity as President of AFGE LOCAL 1199; FEDERAL LABOR RELATIONS AUTHORITY, an administrative federal agency; and DOES I-X and ROE CORPORATIONS, 1-10, inclusive;

Defendants.

STIPULATION AND ORDER FOR DISMISSAL OF ALL CLAIMS AGAINST ALL DEFENDANTS WITH

Case No.: 2:16-cv-1739-JAD-GWF

Plaintiff MICHAEL JOHNSON, by through his attorney of record, ROBERT J. FLUMMERFELT, ESQ., of the law firm of CANON LAW SERVICES, ESQ., and Defendants AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, LOCAL 1199, a local non-profit and national labor union, and VERNON STEED, individually and in his capacity as President of AFGE LOCAL 1199, by and through their attorneys of record PAUL L. MORE, ESQ., and SARAH GROSSMAN-SWENSON, ESQ., of the law firm of McCRACKEN, STEMERMAN, & HOLSBERRRY, and Defendant FEDERAL LABOR RELATIONS AUTHORITY, an administrative federal agency, by and through their attorneys of record FRED

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410 S. Rampart Blvd., Suite 390 Las Vegas, Nevada 89145

Canon Law Services, LLC

B. JACOB, ESQ., ZACHARY R. HENIGE, ESQ., and STEPHANIE J. FOUSE, ESQ., hereby stipulate and agree as follows:

1. That the Complaint of Plaintiff and all claims asserted (or which could have been asserted) shall be DISMISSED WITH PREJUDICE with regard to Defendants AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, LOCAL 1199, a local non-profit and national labor union, and VERNON STEED, individually and in his capacity as President of AFGE LOCAL 1199, and Defendant FEDERAL LABOR RELATIONS AUTHORITY, an administrative federal agency, pursuant to FRCP 41(a)(1), each party to bear their own attorney's fees and costs; and

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## || Case 2:16-cv-01739-JAD-GWF | Document 14 | Filed 08/30/16 | Page 3 of 4

	1	2. That all upcoming court dates pertaining to this matter, including any pendir		
	2	motions or trial dates, shall be VACATED.		
	3			
	4	DATED this <u>29<sup>th</sup></u> day of August, 2016.	DATED this <u>29<sup>th</sup></u> day of August, 2016.	
	5 6	/s/ ROBERT J. FLUMMERFELT, ESQ.	/s/ FRED B. JACOB, ESQ.	
	7	ROBERT J. FLUMMERFELT, ESQ. Nevada Bar No. 11122	FRED B. JACOB, ESQ. Solicitor	
	8	CANON LAW SERVICES, LLC CanonLawServices@Gmail.com	Telephone: 202.218.7906 ZACHARY R. HENIGE, ESQ.	
	9	410 S. Rampart Blvd., Suite 390 Las Vegas, Nevada 89145	Deputy Solicitor Telephone: 202.218.7908	
	10	Telephone: 702.562.4144	STEPHANIE J. FOUSE, ESQ.	
06	11	Facsimile: 702.866.9868	Attorney Telephone: 202.218.7986	
LLC uite 3 9145	12	Attorney for Plaintiff Michael Johnson	1400 K Street NW Washington, D.C. 20424	
vices, vd., Sı ada 8º -4144	13		<u> </u>	
Canon Law Services, LLC 410 S. Rampart Blvd., Suite 390 Las Vegas, Nevada 89145 (702) 562-4144	14		Attorneys for Defendant FLRA	
non La Ramp Vega (702	15			
Car 410 S. Las	16	DATED this <u>29<sup>th</sup></u> day of August, 2016.		
	17	/s/ SARAH GROSSMAN-SWENSON, ESQ.		
	18			
	19	PAUL L. MORE, ESQ. Nevada Bar No. 9628		
	20	SARAH GROSSMAN-SWENSON, ESQ. Nevada Bar No. 11979		
	21	McCRACKEN, STEMERMAN, & HOLSBER	RRY	
	22	1630 S. Commerce Street, Suite A-1 Las Vegas, Nevada 89102		
	23	Telephone: 702.386.5107 Facsimile: 702.386.9848		
	24	Attorneys for Defendants AFGE Local 1199 &		
	25	Vernon Steed		
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## **ORDER**

Pursuant to the above Stipulation, and good cause appearing therefore, IT IS HEREBY ORDERED, ADJUDGED AND DECREED as follows:

That the Complaint of Plaintiff MICHAEL JOHNSON is hereby DISMISSED WITH PREJUDICE against Defendants AMERICAN FEDERATION OF GOVERNMENT EMPLOYEES, LOCAL 1199, a local non-profit and national labor union, and VERNON STEED, individually and in his capacity as President of AFGE LOCAL 1199, and Defendant FEDERAL LABOR RELATIONS AUTHORITY, an administrative federal agency, in this matter, with each party to bear their own attorney's fees and costs.

IT IS FURTHER ORDERED, ADJUDGED AND DECREED that any upcoming court dates pertaining to this matter, including any pending motions or trial dates, shall be VACATED.

All pending motions are DENIED, and this CASE SHALL BE CLOSED.

Dated: August 30, 2016.

UNITED STATES DISTRICT COURT JUDGE

Respectfully submitted by:

/s/ ROBERT J. FLUMMERFELT, ESQ.

ROBERT J. FLUMMERFELT, ESQ.

Nevada Bar No.: 11122

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